REMARKS

Reconsideration and allowance of the subject application are respectfully requested. By this Amendment, Applicant has added new claims 43-46. Therefore, claims 1-46 are now pending in the application. Applicant respectfully submits that no new matter is added, and traverses all the rejections.

Claim Rejections - 35 U.S.C. § 102

Claims 1-26 and 38-42 are rejected under 35 U.S.C. § 102(b) as being anticipated by Krishnaswamy et al. (US 5,974,421).

Claim 1 recites, *inter alia*, "a first storage area having an object stored therein" and "a second storage area having stored therein an object identifier that identifies the object." The Examiner cites the objects 422 in the client 302 as disclosing the "first storage area having an object stored therein" (See Office Action: page 3). The Examiner also cites the GUID described in Krishnaswamy as disclosing the claimed object identifier (See Office Action: pages 2-3). The Examiner appears to assert that the objects 422 and the GUID both reside in the client 302. However, Applicant respectfully submits that Krishnaswamy is still deficient, as Krishnaswamy fails to disclose or suggest the claimed "second *storage area* having stored therein an object identifier," as recited in claim 1.

Krishnaswamy merely states that "the computer program 412 has a GUID that identifies the object..." (See Krishnaswamy: col. 8, lines 50-51). However, there is no description of a distinct "*storage area* having stored therein an object identifier," as recited in claim 1. Applicant

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respectfully submits that such description of a "storage area having stored therein an object identifier" is altogether absent in Krishnaswamy.

In view of the foregoing, Applicant respectfully submits that claim 1 is patentable over Krishnaswamy. Applicant respectfully submits that claims 6 and 10 are patentable over Krishnaswamy based on the rationale analogous to those discussed with respect to claim 1. Further, Applicant respectfully submits that claims 2-5, 7-9 and 11-16 and 38-40 are patentable by virtue of their dependency from either claims 1, 6 or 10.
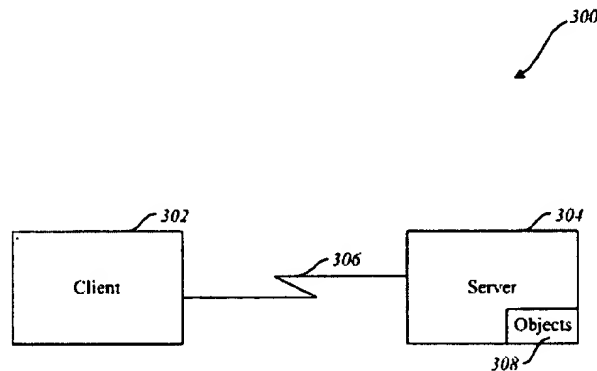
Claims 17 and 22 recite, *inter alia*, "wherein the subject identifier is unique within and outside of the remote resource and identifies the *user*." Applicant respectfully submits that the GUID described in Krishnaswamy fails to disclose or suggest the noted features of claim 17 and 22. That is, the GUID does not pertain to identifying users (such as the client 302), but rather data objects to be retrieved and loaded into the processor of the client 302 (See Krishnaswamy: Fig. 3).

The objects described in Krishnaswamy are *data* objects being loaded into the processor of the application, and as such, Applicant respectfully submits that such objects do not contain "information pertaining to a user accessing a remote resource," as recited in claim 17 and 22 (See Krishnaswamy: col. 8, lines 27-33). Krishnaswamy generally describes a cache-efficient object loader for loading data into processors (See Krishnaswamy: col. 5, lines 12-15). Krishnaswamy seeks to achieve such by utilizing GUIDs to store object entries for related objects in the same bucket chain (See Krishnaswamy: col. 6, lines 35-37, 48-51). However,

there is no disclosure that the objects described in Krishnaswamy "identifies the user" as recited

in claims 17 and 22.

Fig. 3 of Krishnaswamy plainly shows a client server configuration where the client is

already supplied with a GUID. (See Krishnaswamy: col. 6, lines 9-10, "As shown in FIG. 2, the

improved object loader 200 receives a GUID 202 from the application program 204...").

However, the GUID identifies the object 308 stored in the server which is to be loaded

Fig. 3

into the processor within the client 302 (See Krishnaswamy: col. 8, lines 50-53). The GUID

simply does *not* pertain to identifying users (such as the client 302) retrieving objects 308. As

such, Applicant respectfully submits that descriptions regarding identifiers "wherein the subject

identifier is unique within and outside of the remote resource and identifies the *user*" is

altogether absent in Krishnaswamy.

In view of the foregoing, Applicant respectfully submits that claims 17 and 22 are

patentable over Krishnaswamy. Further, Applicant respectfully submits that claims 18-21, 23,

41 and 42 are patentable by virtue of their dependency from either claims 17 or 22.

Claim 24 recites, *inter alia*, "establishing a secure communication path between a

reference monitor protecting the object and a *resource manager* having information describing

the user, in response to a request by the user to access the object." As such, there are three

distinct entities among which the claimed "secure communication path" is established.

Such is plainly distinguishable from the simple client-server configuration described in

Krishnaswamy (See Krishnaswamy: col. 8, lines 13-19; FIG. 3). That is, in Krishnaswamy, there

is no "resource manager having information describing the *user*," as recited in claim 24. Such

may be attributed to the fact that Krishnaswamy merely deals with caching of data objects in its

client application system, and is therefore not pertinent to a user identification in the context of a

user access control method.

Further, in Krishnaswamy, there is no "resource manager having information describing

the user" separate and distinct from the user. Krishnaswamy plainly states that the "GUID 500 is

created by the originator of the object such as an application program" (See Krishnaswamy: col.

9, lines 11-12). As such, in Krishnaswamy, it seems to be that the client entity creates GUIDs

rather than having a distinct "resource manager having information describing the user," as

recited in claim 24.

In view of the foregoing, Applicant respectfully submits that claim 24 is patentable over Krishnaswamy. Further, Applicant respectfully submits that claims 25 and 26 are patentable by virtue of their dependency from claim 24.

Claims 34-37 are rejected under 35 U.S.C. § 102(e) as being anticipated by Garg et al. (U.S Patent No. 6,625,603; "Garg").

As a preliminary matter, Applicant respectfully points out that the Examiner had previously admitted to the deficiency of Garg with respect to claims 34 and 36 (See Office Action of December 2, 2005: page 23, "Garge [sic] fails to discuss the request including a globally unique identifier for the user sent to an external storage management system a request for information about the user.").

Appellant respectfully submits that Garg fails to teach or suggest either a method or code for accessing a protected object comprising "sending a globally unique identifier for a user to a name resolving device, and receiving there from information about the user," and "sending to a storage management system containing an object a request for access to the object, the request including the information about the user," as recited in claims 34 and 36.

Specifically, Garg fails to teach or suggest the provision of a "globally unique identifier" for a "user." The only identifiers of users in Garg are USERIDs and GROUPIDs, neither of which Garg indicates to be "globally unique" in any way. Garg is directed to an access control system for objects that operates within kernel 235 of a single operating system 200 of a computer (See Garg: FIG. 2, col. 3, lines 6-26). In this regard, Col. 3, lines 6-9 discloses that the *Garg* system (emphasis added):

> **should be implemented by a central module within the operating
> system** in order to provide a consistent, non-redundant interface.

Further, Col. 6, line 60 - Col. 7, line 6 discloses that (emphasis added):

> Object manager 225 maintains and manages **objects defined within the
> system**. Objects have properties that are typically used to describe
> various aspects of the components **of the system**. Many different types
> of **objects may exist in the system**, and, in one embodiment of the
> invention, **each object is assigned two unique identifiers known as a
> Globally Unique Identifier (GUID) to distinguish it from the other
> objects**. GUIDs are 128 bit numbers and are guaranteed not to be re-used
> by another application. The first identifier is the Object Type GUID,
> which identifies the particular **type of object being managed by the
> object manager**. The second identifier is the Object GUID, which
> uniquely identifies the **particular object within a group of objects** of
> the same type.

Therefore, it is clear that Garg only discloses the provision of an object or object type

GUID within a *single storage system* 200, as the only disclosed purpose of the GUIDs of Garg is

to differentiate the individual objects managed by the object manager 225 within that operating

system 200. As such, Applicant respectfully submits that Garg fails to teach or suggest that these

system-wide GUIDs are in any way unique outside of the disclosed system 200.

In view of the foregoing, Applicant respectfully submits that claims 34 and 36 are

patentable. Further, Applicant respectfully submits that claim 35 and 37 are patentable by virtue

of their dependency from claims 34 and 36, respectively.

Claim Rejections - 35 U.S.C. § 103

Claims 27-33 are rejected under 35 U.S.C. § 103(a) as being unpatentable over

Krishnaswamy et al., and further in view of Garg et al.

Applicant respectfully submits that neither Garg nor Krishnaswamy (either alone or in combination) teaches or suggests an information storage management system where "the resource manager receives a user's request for access to the protected object, the request including a *globally unique identifier for the user requesting the access*," as recited in independent claims 27 and 30.

Specifically, Applicants respectfully submit that Krishnaswamy is silent regarding any particular description of a unique user identification under the rationale analogous to those discussed with respect to claims 1, 6 and 10. Garg also fails to teach or suggest the provision of a "globally unique identifier" for a "user." As discussed with respect to claims 34 and 36, the only identifiers of users in *Garg* are USERIDs and GROUPIDs, neither of which *Garg* indicates to be "globally unique" in any way.

In view of the foregoing, Applicant respectfully submits that claims 27 and 30 are patentable over Krishnaswamy over Garg. Further, Applicant respectfully submits that claims 28-29 and 31-33 are patentable by virtue of their dependency from claims 27 and 30, respectively.

New Claims

For additional claim coverage merited by the scope of the invention, Applicant is adding new claims 43-46. Applicant respectfully submits that claims 43-46 are patentable at least by virtue of their dependency from claim 1.

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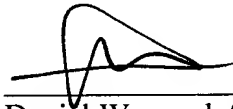## *Conclusion*

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

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Date: September 29, 2006

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